

SHUMWAY • VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
SHUMWAY VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770
Facsimile: (702) 478-7779
Email: garrett@shumwayvan.com
Attorney for MDM Consultants, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

INVEST VEGAS LLC; MDM
CONSULTANTS, INC.

Plaintiff,

v.

21ST MORTGAGE CORPORATION; CAL-
WESTERN RECONVEYANCE
CORPORATION; NATIONAL CITY
MORTGAGE, A DIVISION OF
NATIONAL CITY BANK OF INDIANA;
COMMONWEALTH LAND TITLE
INSURANCE COMPANY; ONTARIO
CONDOMINIUM RENTAL SERVICES,
INC; HARLEE S. CARTER; LANA
CARTER; DARREN C. BOUTON; DOES I
through X, inclusive; ROE BUSINESS
ENTITIES I through X inclusive.

Defendants.

Case No.: 2:15-cv-00644-VCF

**STIPULATION AND ORDER TO EXTEND
PRE-TRIAL ORDER DEADLINE**

(THIRD REQUEST)

Plaintiff MDM Consultants (“Plaintiff”) and Defendant 21st Mortgage Corporation (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree that the deadline to submit the Joint Pretrial Order in this matter be continued by 14 days to allow for the Parties to fully prepare and discuss the various aspects of trial. The Parties diligently discussed settlement prospects and participated in mediation which concluded without resolution in the afternoon of July 15, 2021. Because of the length of the mediation, the Parties have not had a sufficient opportunity to fully and thoroughly review the

various aspects of the Joint Pretrial Order and discuss what evidence will be presented at the time of trial. Accordingly, the Parties are requesting that the current deadline to submit the Joint Pretrial Order, currently scheduled for July 19, 2021, be extended to August 2, 2021. This is the third stipulation of the Parties to continue this deadline. The relevant timeline has not lapsed as of the submission of this Stipulation, and this additional time will allow the parties to further confer about exhibits and witnesses to be presented at trial, and to timely submit a Joint Pretrial Order. Further, this Stipulation complies with the relevant provisions of LR IA 6-1(a) and LR 26-4. Therefore, the Parties propose that the deadline for the Joint Pretrial Order be continued until August 2, 2021.

DATED this 19th day of July, 2021.

SHUMWAY VAN

By: /s/ Garrett R. Chase
 GARRETT R. CHASE, ESQ.
 Nevada Bar No. 14498
 8985 S. Eastern Ave., Suite 100
 Las Vegas, NV 89123
Attorney for MDM Consultants, Inc.

DATED this 19th day of July, 2021.

HUTCHINSON & STEFFEN, PLLC

By: /s/ Michael R. Brooks
 MICHAEL R. BROOKS, ESQ.
 Nevada Bar No. 7287
 8985 S. Eastern Ave., Suite 100
 Las Vegas, NV 89123
Attorney for 21st Mortgage Corporation

SHUMWAY • VAN

8985 South Eastern Avenue, Suite 100

Las Vegas, Nevada 89123

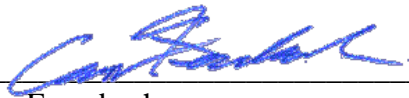
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

ORDER

Upon Stipulation of the parties, and for good cause appearing therefore, IT IS HEREBY ORDERED as follows:

a. Deadline to for Joint Pretrial Order: August 2, 2021.

IT IS SO ORDERED.


Cam Ferenbach
United States Magistrate Judge

Respectfully Submitted by:

SHUMWAY VAN

BY: /s/ Garrett R. Chase
GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
8985 South Eastern Avenue, Suite 100
Las Vegas, NV 89123
Attorney for MDM Consultants, Inc.

SHUMWAY • VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

From: [Michael R. Brooks](#)
To: [Garrett R. Chase](#)
Cc: [Marina Scott](#)
Subject: RE: 21st Mortgage adv. Invest Vegas
Date: Monday, July 19, 2021 2:29:50 PM

This looks fine.

From: Garrett R. Chase <Garrett@shumwayvan.com>
Sent: Monday, July 19, 2021 4:00 PM
To: Michael R. Brooks <mbrooks@hutchlegal.com>
Cc: Marina Scott <marinas@shumwayvan.com>
Subject: RE: 21st Mortgage adv. Invest Vegas

Mike,

Attached is the proposed stipulation for your review. If it looks good, let me know and we'll get it submitted.

Best,

Garrett R. Chase, Esq.

SHUMWAY VAN
8985 S. Eastern Ave., Suite 100
Las Vegas, Nevada 89123
Ph: (702) 478-7770
Fax: (702) 478-7779
www.shumwayvan.com

This message and any attached documents contain information from the law firm of Shumway Van that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply email and then delete this message.

From: Michael R. Brooks <mbrooks@hutchlegal.com>
Sent: Monday, July 19, 2021 1:55 PM
To: Garrett R. Chase <Garrett@shumwayvan.com>
Cc: Marina Scott <marinas@shumwayvan.com>
Subject: RE: 21st Mortgage adv. Invest Vegas

Yes, Not sure what happened. Send it over.

From: Garrett R. Chase <Garrett@shumwayvan.com>
Sent: Monday, July 19, 2021 3:49 PM
To: Michael R. Brooks <mbrooks@hutchlegal.com>
Cc: Marina Scott <marinas@shumwayvan.com>
Subject: RE: 21st Mortgage adv. Invest Vegas